

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

SECURITIES AND EXCHANGE COMMISSION,	§	
	§	
V.	§	Case No. 6:23-cv-00321
	§	
ROY W. HILL, et al.	§	

UNOPPOSED SECOND MOTION TO APPROVE RETENTION OF PERSONNEL

Receiver Albert C. Black III moves to approve the retention of an additional person, respectfully stating:

1. On May 3, 2023, the Court entered its Order Appointing Receiver (Doc. 8).
2. The order requires the filing of a motion to approve the employment of “Retained Personnel” (*id.* at 17).
3. To carry out his duties, the Receiver needs the assistance of an expert in the type of technology at issue in this case. Defendant Clean Energy Technology Association, Inc. (“CETA”) spend tens of millions of dollars on equipment of dubious value (see accompanying appendix (“Appx.”) at 6-10). While it is known that the equipment was not producing the revenues CETA claims, the equipment likely has some value that can be recovered through sale or salvage. It is appropriate for an expert to determine what may be valuable and the best means of obtaining that value.
4. The Receiver has identified Byron Veech, who, due to his deep background in the coal industry and chemistry, is particularly well-qualified to assist the Receiver in assessing the equipment and making recommendations for its disposition.
5. Mr. Veech’s CV (Appx. 2-5) and proposed engagement letter (Appx. 11-16) are included in the accompanying appendix. Essentially, the engagement will be hourly, at a rate of \$325 per hour (*id.*).

WHEREFORE, the Receiver prays that the Court approve the retention of Mr. Veech to assist him in carrying out his duties in this matter.

Respectfully submitted,

/s/ Dennis Roossien

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COUNSEL FOR RECEIVER

CERTIFICATE OF CONFERENCE

I hereby certify that this motion is not opposed by the Plaintiff and the Individual Defendants. All counsel of record have stated they do not oppose the motion.

/s/ Dennis Roossien

CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of September, 2023, a true and correct copy of the foregoing instrument was served electronically in compliance with the Court's Electronic Filing Procedures on all counsel of record who are deemed to have consented to electronic service.

/s/ Dennis Roossien